

Element Performance Inspection (EPI) Data Collection Tool

1.3.7 Outsource Organization (AW)

ELEMENT SUMMARY INFORMATION

Purpose of this Element (certificate holder's responsibility):

- To ensure when making arrangements with other persons to perform maintenance, preventive maintenance, or alterations of its aircraft, including airframes, aircraft engines, propellers, appliances, emergency equipment, and parts thereof, the performance is in accordance with its continuous airworthiness maintenance program (CAMP), maintenance manual, and the regulations of Title 14 of the Code of Federal Regulations (14 CFR).

Objective (FAA oversight):

- To determine the effectiveness of the certificate holder's procedures in meeting the desired output of the process.
- To determine if the certificate holder follows its procedures, controls, process measurements, and interfaces for the Outsource Organization process.
- To determine if there were any changes in the personnel identified by the certificate holder as having responsibility and/or authority for the Outsource Organization process.

Specific Instructions:

- It is imperative that the aviation safety inspector (ASI) performing this Element Performance Inspection (EPI) understands that the primary objective of the 1.3.7 surveillance is to verify compliance with the air carrier's CAMP. Any organization or individual that performs work for an air carrier is an extension of that air carrier. Therefore, when a part 145 repair station performs work for an air carrier, the air carrier ASI is not there to perform surveillance to 14 CFR part 145 rules.
- To accomplish this EPI, the inspector verifies that the certificate holder is able to determine by audit, or other means, that the observed maintenance provider(s) (outsource organization(s)) met the certificate holder's requirements, and performed maintenance in accordance with the certificate holder's maintenance manual and CAMP.
- When an air carrier outsources maintenance to a maintenance provider, 14 CFR part 145, 145.205, and 14 CFR part 121, 121.363, together, establish the fact, that all 14 CFR part 121 maintenance rules take precedent. The maintenance provider becomes, in effect, an extension of the carrier's maintenance organization. All work must be accomplished in accordance with that carrier's CAMP.
- In questions 1.3, 1.4, 1.5, 1.6, and 1.7, the inspector will verify that the certificate holder's procedures for the air carrier to maintain control of all levels of sub-contracting maintenance arrangements with other persons performing maintenance, preventive maintenance, and alterations. It must also verify that all sub-contracted maintenance is performed in accordance with the carrier's CAMP is followed.
- In question 2, the inspector will verify that the certificate holder's procedures and instructions to review, evaluate, and authorize the use of the maintenance providers procedures as a whole, or in part, authorize the repair station to become an extension of the carrier's maintenance program. The inspector must request and review the documents the carrier has provided the outsource maintenance provider for the proper completion of the work to be accomplished.
- In question 3, the inspector must determine if the air carrier's Outsource Maintenance Process procedures, policies, methods, information, and instructions are easily located,

recognized, and controllable. These must include the method of disseminating it to the maintenance providers. The inspector must explain to the carrier the benefits of having a separate chapter or section of their manual dedicated for all outsourcing maintenance requirements.

- In question 5, the inspector must review work requests for completeness of the actual work for compliance with the provided data and the air carriers CAMP. To accomplish this, they must perform an in process inspection of a particular article or articles that has been completed by the outsource maintenance provider. The entire maintenance process must be evaluated from the time it is received, until it is completed, in accordance with the carrier s CAMP.

Related EPIs:

- 1.2.1 Airworthiness Release / Logbook Entry (AW)
- 1.2.2 Major Repairs and Alterations Records (AW)
- 1.2.3 Maintenance Log / Recording Requirements (AW)
- 1.3.2 Inspection Program (AW)
- 1.3.3 Maintenance Facility / Main Maintenance Base (AW)
- 1.3.4 Required Inspection Items (RII) (AW)
- 1.3.5 MEL / CDL / Deferred Maintenance (AW)
- 1.3.6 AD Management (AW)
- 1.3.8 Control of Calibrated Tools and Test Equipment (AW)
- 1.3.9 Engineering / Major Repairs and Alterations (AW)
- 1.3.10 Parts / Material Control / SUP (AW)
- 1.3.11 Continuous Analysis and Surveillance (CAS) (AW)
- 1.3.15 Reliability Program (AW)
- 1.3.16 Fueling (AW)
- 1.3.18 De-Icing Program (AW)
- 1.3.19 Lower Landing Minimums (LLM) (AW)
- 2.1.1 Manual Currency (AW)
- 2.1.2 Content Consistency Across Manuals (AW)
- 2.1.3 Distribution (Manuals) (AW)
- 2.1.4 Availability (Manuals) (AW)
- 2.1.5 Supplemental Operations Manual Requirements (AW)
- 4.1.1 RII Personnel (AW)
- 4.1.2 Maintenance Certificate Requirements (AW)
- 4.4.1 Recency of Experience (AW)
- 4.4.2 Display of Certificate (AW)
- 4.4.3 Privileges Airframe and Powerplant (AW)
- 4.4.4 Privileges and Limitations for Repairmen (AW)
- 5.1.1 Line Stations (AW)

SUPPLEMENTAL INFORMATION

Specific Regulatory Requirements (SRRs):

- SRRs:
 - 119.43(b)
 - 119.43(b)(1)
 - 119.43(b)(2)
 - 119.43(c)
 - 121.135(a)(1)
 - 121.135(b)(1)
 - 121.135(b)(2)

- SRRs:
 - 121.135(b)(3)
 - 121.363(b)
 - 121.365(a)
 - 121.365(b)
 - 121.365(c)
 - 121.367
 - 121.367(a)
 - 121.367(b)
 - 121.367(c)
 - 121.369(a)
 - 121.369(b)
 - 121.369(b)(1)
 - 121.369(b)(3)
 - 121.369(b)(4)
 - 121.369(b)(5)
 - 121.369(b)(6)
 - 121.369(b)(7)
 - 121.369(b)(8)
 - 121.369(b)(9)
 - 121.371(a)
 - 121.371(b)
 - 121.371(c)
 - 121.371(d)
 - 121.373(a)
 - 121.375
 - 121.377
 - 121.378(a)
 - 121.378(b)
 - 121.379(a)
 - 121.380
 - 121.457(b)
 - 121.703
 - 121.703(g)
 - 121.705
 - 121.709(a)
 - D.072(c)
 - D.091
 - D.091(a)
 - D.091(b)
 - D.091(c)
 - D.091(d)
 - D.091(e)
 - D.091(f)
 - D.091(g)

Related CFRs & FAA Policy/Guidance:

- Related CFRs:
 - Intentionally left blank
- FAA Policy/Guidance:
 - FAA Order 8300.10, Volume 2, Chapter 69

EPI SECTION 1 - PERFORMANCE OBSERVABLES

Objective: (FAA oversight responsibility): The tasks and questions in this section of the data collection tool (DCT) are designed to assist the inspector in determining if the certificate holder follows its written procedures and controls and meets the established performance measures of the process. To accomplish this, questions have been generated to test both the outputs of the process as well as the process itself. Question 1 and its following subquestions are directed at the output(s) of the process, whereas questions 2 through 6, when answered, should be directed at the process itself.

Tasks

	To meet this objective, the inspector must accomplish the following tasks:
1.	Review information listed in the Supplemental Information section of this DCT.
2.	Review the policies, procedures, instructions, and information for the Outsource Organization process contained in the certificate holder's manual.
3.	Review the last accomplished associated safety attribute inspection (SAI) for this element with emphasis on the controls, process measurements, and interface attribute section responses.
4.	Observe the Outsource Organization process to gain an understanding of the procedures, instructions, and information contained in the certificate holder's manual.
5.	Discuss the Outsource Organization process with personnel (other than management) who perform the duties and responsibilities required by the Outsource Organization process.
6.	Before conducting inspection activities at 14 CFR part 145 repair stations, you should contact and coordinate your activities with the principal inspector (PI).

Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Determine whether the following performance measures were met:	
1.1.	Did the certificate holder's Continuing Analysis and Surveillance System detect and correct deficiencies in programs carried out by the outsource organization?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.2.	Were aircraft, including airframes, engines, propellers, appliances, emergency equipment, or parts thereof, released to service by the maintenance provider, maintained in an airworthy condition for operation under 14 CFR part 121?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.3.	<p>Were competent personnel provided by the maintenance provider for the proper performance of maintenance, preventive maintenance, and alterations on the certificate holder's aircraft, airframes, engines, propellers, appliances, emergency equipment, or parts thereof?</p> <p><i>Related Performance JTIs:</i></p> <ol style="list-style-type: none"> 1. Check at the outsource provider, that an adequate organization is provided for the proper performance of maintenance, preventive maintenance, and alterations in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(b)(1); 121.365(a) 2. Check at the outsource provider, that any person performing a required inspection for the certificate holder is appropriately certificated, properly trained, qualified, and authorized to do so in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(b)(19); 121.371(a) 3. Check at the outsource provider, that any person performing a required 	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

	<p>inspection for the certificate holder is performing that inspection under the supervision and control of an inspection unit in accordance with the certificate holder's manual.</p> <p><i>Sources:</i> 121.135(b)(19); 121.371(b)</p>	
4.	<p>Check at the outsource provider, that any person performing a required inspection for the certificate holder did not perform the item of work required to be inspected in accordance with the certificate holder's manual.</p> <p><i>Sources:</i> 121.135(b)(19); 121.371(c)</p>	
5.	<p>Check at the aircraft, for any person performing a required inspection for the certificate holder that that person did not perform the item of work required to be inspected in accordance with the certificate holder's manual.</p> <p><i>Sources:</i> 121.135(b)(19); 121.371(c)</p>	
6.	<p>Check at the aircraft, for any person performing a required inspection for the certificate holder that that person is on the current list of persons trained, qualified, and authorized to perform required inspections in accordance with the certificate holder's manual.</p> <p><i>Sources:</i> 121.135(a)(1); 121.371(d)</p>	
7.	<p>Check at the air carrier specified location, for any person performing a required inspection for the certificate holder that that person is on the current list of persons trained, qualified, and authorized to perform required inspections in accordance with the certificate holder's manual.</p> <p><i>Sources:</i> 121.135(a)(1); 121.371(d)</p>	
8.	<p>Check at the outsource provider, that any person performing a required inspection for the certificate holder has been given written information describing the extent of their responsibilities, authorities and inspectional limitations in accordance with the certificate holder's manual.</p> <p><i>Sources:</i> 121.135(a)(1); 121.371(d)</p>	
9.	<p>Check at the outsource provider, that any person performing a required inspection for the certificate holder has written information describing the extent of their responsibilities, authorities and inspectional limitations in accordance with the certificate holder's manual.</p> <p><i>Sources:</i> 121.135(a)(1); 121.371(d)</p>	
10.	<p>Check at the air carrier specified location, that any person performing a required inspection for the certificate holder has been given written information describing the extent of their responsibilities, authorities and inspectional limitations in accordance with the certificate holder's manual.</p> <p><i>Sources:</i> 121.135(a)(1); 121.371(d)</p>	
11.	<p>Check at the air carrier specified location, that any person performing a required inspection for the certificate holder has written information describing the extent of their responsibilities, authorities and inspectional limitations in accordance with the certificate holder's manual.</p> <p><i>Sources:</i> 121.135(a)(1); 121.371(d)</p>	
12.	<p>Check at the training center, that a training program provides instructions for persons performing maintenance, preventive maintenance or inspection functions to ensure each person is fully informed about procedures, techniques, new equipment and is competent to perform their duties specific to that work In accordance with the certificate holder's manual.</p> <p><i>Sources:</i> 121.135(b)(16); 121.375</p>	
13.	<p>Check at the outsource provider, that persons (within the United States) performing maintenance or preventive maintenance functions for the</p>	

	<p>certificate holder have been relieved from duty for a period of at least 24 consecutive hours within the last seven consecutive days or equivalent within the calendar month.</p> <p><i>Sources:</i> 121.135(b)(16); 121.377</p> <p>14. Check at the outsource provider, that any person directly in charge of maintenance, preventive maintenance, or alterations is appropriately certificated in accordance with the certificate holder's manual.</p> <p><i>Sources:</i> 121.135(b)(16); 121.378(a); 121.378(b)</p> <p>15. Check at the outsource provider, that any person performing required inspections for the certificate holder is appropriately certificated in accordance with the certificate holder's manual.</p> <p><i>Sources:</i> 121.135(b)(16); 121.378(a); 121.378(b)</p> <p>16. Check at the aircraft, that after maintenance, preventive maintenance, or alterations is performed by an outsource provider, an airworthiness release or appropriate entry in the aircraft log has been prepared prior to the operation of the aircraft in accordance with the certificate holder's manual.</p> <p><i>Sources:</i> 121.135(b)(16); 121.709(a); 121.709(b)(1)</p>	
1.4.	<p>Were adequate facilities provided by the maintenance provider for the proper performance of maintenance, preventive maintenance, and alterations on the certificate holder's airframes, engines, propellers, appliances, emergency equipment, or parts thereof?</p> <p><i>Related Performance JTIs:</i></p> <p>1. Check at the outsource provider, that adequate facilities are provided for the proper performance of inspections, maintenance, preventive maintenance, or alterations in accordance with the certificate holder's manual.</p> <p><i>Sources:</i> 121.135(b)(19); 121.369(b)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.5.	<p>Were adequate tools, equipment or test apparatus provided by the maintenance provider for the proper performance of maintenance, preventive maintenance, and alterations on the certificate holder's aircraft including airframes, engines, propellers, appliances, emergency equipment, or parts thereof?</p> <p><i>Related Performance JTIs:</i></p> <p>1. Check at the outsource provider, that adequate equipment is provided for the proper performance of inspections, maintenance, preventive maintenance, or alterations in accordance with the certificate holder's manual.</p> <p><i>Sources:</i> 121.135(b)(19); 121.367(b); 121.369(b)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.6.	<p>Was the maintenance provider appropriately rated/authorized for the maintenance, preventive maintenance, or alterations it performed on the certificate holder's aircraft, airframes, engines, propellers, appliances, emergency equipment, or parts thereof?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.7.	<p>Was current technical and administrative material for the proper performance of maintenance, preventive maintenance, and alterations of the certificate holder's aircraft, airframes, engines, propellers, appliances, emergency equipment, or parts thereof, accessible to outsource provider personnel while performing their assigned duties?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.	<p>Were the certificate holder's policies, procedures, instructions, and information,</p>	<input type="checkbox"/> Yes

	<p>contained in its manual for the Outsource Organization process, followed?</p> <p><i>Related Performance JTIs:</i></p> <ol style="list-style-type: none"> 1. Check at the outsource provider, for completed work documents to ensure inspections, maintenance, preventive maintenance, or alterations performed were performed in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(b)(19); 121.367(a); 121.369(b) 2. Check at the outsource provider, that an adequate organization is provided for the proper performance of required inspections in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(b)(1); 121.365(b) 3. Check at the outsource provider, that an organizational chart that clearly defines a separation of required inspection functions from other maintenance, preventive maintenance, or alterations below the level of administrative control at which those functions are exercised in accordance with the certificate holder's manual. <i>Sources:</i> 121.365(b); 121.365(c) 4. Check at the air carrier specified location, for a list of persons authorized to perform any of its required inspections, maintenance, preventive maintenance, or alterations and a general description of that work in accordance with the certificate holder's manual. <i>Sources:</i> 121.369(a) 5. Check at the outsource provider, that a current list of persons trained, qualified, and authorized to perform required inspections for the certificate holder is maintained in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(a)(1); 121.371(d) 6. Check at the outsource provider, that persons listed as trained, qualified, and authorized to perform required inspections for the certificate holder are identified by name, occupational title, and inspections they are authorized to perform in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(a)(1); 121.371(d) 7. Check at the outsource provider, that a list of required inspection personnel is available for inspection by the Administrator in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(b)(1); 121.371(d) 8. Check at the air carrier specified location, that a list of required inspection personnel is available for inspection by the Administrator in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(b)(1); 121.371(d) 	<input type="checkbox"/> No, Explain
3.	Were the Outsource Organization process controls followed?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
4.	<p>Did the records for the Outsource Organization process comply with the instructions provided in the certificate holder's manual?</p> <p><i>Related Performance JTIs:</i></p> <ol style="list-style-type: none"> 1. Check at the outsource provider, for completed work documents to ensure inspections, maintenance, preventive maintenance, or alterations performed were performed in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(b)(19); 121.367(a); 121.369(b) 	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

	<ol style="list-style-type: none"> 2. Check at the outsource provider, that training records of personnel performing inspections, maintenance, preventive maintenance, or alterations for the certificate holder, verify they have been trained and qualified in accordance with the certificate holder's procedures and standards. <i>Sources:</i> 121.135(b)(16); 121.135(b)(19); 121.367(b); 121.369(b) 3. Check at the training center, that training records of personnel performing inspections, maintenance, preventive maintenance, or alterations for the certificate holder, verify they have been trained and qualified in accordance with the certificate holder's procedures and standards. <i>Sources:</i> 121.135(b)(16); 121.135(b)(19); 121.367(b); 121.369(b) 4. Check the aircraft release record, that each aircraft released to service by the outsource provider is airworthy following completion of inspections, maintenance, preventive maintenance, or alterations in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(b)(16); 121.135(b)(19); 121.367(c); 121.369(b) 5. Check at the records repository, to ensure that completed records of maintenance performed by persons outside the certificate holder's organization include the name of the person who performed that work and a general description (or reference to data) of that work in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(a)(1); 121.369(c)(1); 121.369(c)(2) 6. Check at the outsource provider, to ensure that completed records of maintenance performed by it for the certificate holder includes the name of the person who performed that work and a general description (or reference to data) of that work in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(a)(1); 121.369(c)(1); 121.369(c)(2) 7. Check at the records repository, to ensure that completed records of maintenance performed by persons outside the certificate holder's organization include the name or other positive identification of the individual who approved the work performed in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(a)(1); 121.369(c)(3) 8. Check at the outsource provider, to ensure that completed records of maintenance performed by it for the certificate holder include the name or other positive identification of the individual who approved the work performed in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(a)(1); 121.369(c)(3) 9. Check at the records repository, for completed records of maintenance of persons performing required inspections for the certificate holder to ensure those persons were appropriately certificated, properly trained, qualified, and authorized to do so in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(b)(19); 121.371(a) 10. Check at the records repository, for completed records of maintenance of persons performing required inspections for the certificate holder to ensure those persons did not perform the item of work required to be inspected in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(b)(19); 121.371(c) 11. Check at the records repository, for completed maintenance records of major repairs or major alterations accomplished by outsource organizations to determine that work was done in accordance with 	
--	---	--

	<p>technical data approved by the Administrator. <i>Sources:</i> 121.135(b)(16); 121.379(b)</p> <p>12. Check at the outsource provider, that service difficulty reporting tasks required by Part 121.704 have been assigned to the certificated repair station by the Part 121 certificate holder. <i>Sources:</i> 121.135(b)(16); 121.704(f)</p> <p>13. Check at the air carrier specified location, that the certificate holder received copies of each Service Difficulty manual. Report submitted for it by the repair station in accordance with the certificate holder's. <i>Sources:</i> 121.135(b)(16); 121.704(f)</p> <p>14. Check at the outsource provider, that no person is withholding Service Difficulty Reports even though all information required is not available in accordance with the certificate holder's manual. <i>Sources:</i> 121.135(b)(16); 121.704(g)</p>	
5.	Were the process measurements for the Outsource Organization process effective in identifying problems or potential problems and providing corrective action for them?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
6.	Did personnel properly handle the associated interfaces by complying with other written policies, procedures, instructions, and/or information that are related to this element?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

EPI SECTION 1 - PERFORMANCE OBSERVABLES Drop-Down Menu	
1.	Personnel.
2.	Tools and Equipment.
3.	Technical Data.
4.	Procedures, policies or instructions or information.
5.	Materials.
6.	Facilities.
7.	Controls.
8.	Process Measures.
9.	Interfaces.
10.	Desired Outcome.
11.	Other.

EPI SECTION 2 - MANAGEMENT RESPONSIBILITY & AUTHORITY OBSERVABLES

Objective: The questions in this section address the responsibility and authority of the process. They are designed to assist the inspector in determining if there is a clearly identifiable, qualified, and knowledgeable person who is responsible for the process, is answerable for the quality of the process, and has the authority to establish and modify the process. (The person with the authority may or may not be the person with the responsibility.)

Tasks

	To meet this objective, the inspector must accomplish the following tasks:
	NOTE: If no personnel or major program changes (as defined by the principal inspector (PI)) affecting the responsibility or authority attributes for this element have occurred since the last SAI and/or EPI was accomplished, then do not perform tasks 3-6, below. Answer questions 1 and 2, below, and provide the name/title.
1.	Identify the person who has overall responsibility for the Outsource Organization process.
2.	Identify the person who has overall authority for the Outsource Organization process.
3.	Review the duties and responsibilities for those who manage the Outsource Organization process documented in the certificate holder's manual.
4.	Review the appropriate organizational chart.
5.	Discuss the Outsource Organization process with the management personnel identified in tasks 1 and 2.
6.	Evaluate the qualifications and work experience of the management personnel identified in tasks 1 and 2.

Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Is there a clearly identified person who is responsible for the quality of the Outsource Organization process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain Name/Title:
2.	Is there a clearly identified person who has authority to establish and modify the certificate holder's policies, procedures, instructions, and information for the Outsource Organization process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain Name/Title:
3.	Does the responsible person acknowledge that he/she has responsibility for the Outsource Organization process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
4.	Does the person with authority acknowledge that he/she has authority for the Outsource Organization process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
5.	Does the person with responsibility for the Outsource Organization process meet the qualification standards?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
6.	Does the person with authority to establish and modify the Outsource Organization process meet the qualification standards?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change

7.	Does the person with responsibility understand the controls, process measurements, and interfaces associated with the Outsource Organization process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
8.	Does the person with authority understand the controls, process measurements, and interfaces associated with the Outsource Organization process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
9.	Does the responsible person know who has authority to establish and modify the Outsource Organization process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
10.	Does the person with authority know who has the responsibility for the Outsource Organization process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change

EPI SECTION 2 - MANAGEMENT RESPONSIBILITY & AUTHORITY OBSERVABLES	
Drop-Down Menu	
1.	Assignment of responsibility.
2.	Assignment of authority.
3.	Does not understand procedures, policies or instructions and information.
4.	Does not understand controls.
5.	Does not understand process measurements.
6.	Does not understand interfaces.
7.	Span of control.
8.	Position vacant.
9.	Other.